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RECORDS AND REPORTING

May 2, 2001

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 000121-TP

Dear Ms. Bayó:

Enclosed please find an original and fifteen copies of the BellSouth Telecommunications, Inc. Request for Confidential Classification of response to Staff's First Request for Production of Documents Item No. 1, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

R. Douglas Lackey
R. Douglas Lackey (KA)

cc: All Parties of Record
Marshall M. Criser III
Nancy B. White

This confidentiality request was filed by or for a "telco" for DN 05574-01. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

(x-ref. 04434-01)

RECEIVED & FILED

D. Lockard
FPSC-BUREAU OF RECORDS

Confidential
DOCUMENT NUMBER-DATE

05574 MAY-20

FPSC-RECORDS/REPORTING

Request
DOCUMENT NUMBER-DATE

05573 MAY-20

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 000121-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U.S. Mail and via Hand Delivery (*) this 2nd day of May, 2001 to the following:

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R. Douglas Lackey

**(+) Signed Protective
Agreement**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment)
Of operations support systems permanent) Docket No.: 000121-TP
Performance measures for incumbent local)
Exchange telecommunications companies)
_____) Filed: May 2, 2001

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to Rule 25-22.006, Florida Administrative Code, hereby files this Request for Confidential Classification, and states the following:

1. On March 21, 2001, the Staff of the Florida Public Service Commission (Staff) filed their First Request for Production of Documents to BellSouth Telecommunications, Inc. (BellSouth). On April 10, 2001, BellSouth filed its responses, some of which contains proprietary, confidential information. At that same time, BellSouth filed a Notice of Intent to Request Confidential Classification, indicating its intent to ask for confidential classification.

2. BellSouth hereby files this Request for Confidential Classification of its response to Request for Production of Documents Item No. 1. The information contained in the specific document furnished by BellSouth in response to this request includes confidential business information.

4. Attachment "A" to BellSouth's Request for Confidential Classification contains the specific justification for the request for confidential classification along with a list that identifies the location of the information designated by BellSouth as confidential.

5. Attachment "B" to BellSouth's Request for Confidential Classification contains two copies of the document with the confidential information redacted.

6. Attachment "C" to BellSouth's Request for Confidential Classification is a sealed envelope containing one copy of the document including those portions that are confidential and proprietary.

7. The information contained in BellSouth's response to Staff's request includes confidential business information that is considered proprietary to BellSouth. Therefore, such information should continue to be classified as confidential business information pursuant to Section 364.24 and Section 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

8. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

9. The original of this Request was filed today with the Division of Records and Reporting, and a copy was served on the Parties.

WHEREFORE, based on the foregoing, BellSouth respectfully requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 2nd day of May, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

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c/o Nancy Sims

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
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5/2/01**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 1) FILED APRIL 10, 2001 IN FLORIDA DOCKET NO. 000121-TP

Explanation of Proprietary Information

The subject information, The Performance Measurements Quality Assurance Plan (PMQAP), documents and maintains the systematic procedures used to ensure that BellSouth produces accurate and reliable service quality measurement reports. With PMQAP, BellSouth maintains the processes that passed independent testing and continues to detect and address errors and anomalies that may occur after conclusion of the third-party tests. Other entities who have similar obligations regarding the production of service quality measurement reports have inquired as to whether BellSouth's programs would be commercially available, thus demonstrating that this information is commercially valuable and constitutes proprietary business information of BellSouth. If this information were disclosed publicly, it would damage the competitive and property interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
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POD No. 1

Page No.

Reason

Entire Document

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ATTACHMENT B

**BellSouth Telecommunications, Inc.
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
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FILED APRIL 10, 2001 IN FLORIDA DOCKET NO. 000121-TP**

Two Redacted Copies

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ATTACHMENT C

**BellSouth Telecommunications, Inc.
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5/2/01**

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